

### DECLARATION OF EFRAIN ALSINA

I, Efrain Alsina, a.k.a Efrain Alsina Rios, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called on to testify I could and would do so competently and truthfully to these matters.
2. I am a sole practitioner and run Efrain Alsina, P.A., an immigration law firm based in Orlando, Florida. I have been practicing immigration law for 25 years.
3. I currently represent R.P., who is currently detained at the facility known as Alligator Alcatraz. R.P. is a national of Brazil. He has lived in the United States since January 2005 and works in construction. R.P. is the father of 3 U.S. citizens ages 29, 18 and 12. R.P. is eligible for release from detention on bond.
4. His removal proceedings were administratively closed in 2016, before he was taken into custody at Alligator Alcatraz. His criminal record is for two incidents of driving without a license in Orange County, Florida, one in 2005, the other in 2012. He complied with all requirements in both cases.
5. R.P. was taken into custody on or about July 8, 2025. He was stopped by local law enforcement on the Turnpike on his way to work for no apparent reason. At the time he was stopped, he had a valid driver's license and was not cited or charged for any violation. He was taken to Orange County jail. He showed up at the ICE Detainee locator without reference to a specific detention facility, only to contact the ICE field office with a (954) area code.
6. On July 10 or 11, 2025, I called the Broward Transition Center and was told that R.P. had been, but was no longer at that facility.
7. On the evening of July 12, 2025, R.P.'s wife sent a message to my office to notifying that he was being held at TNT, inmate number [REDACTED] and booking number [REDACTED]. After RP notified his family that he was detained at TNT, he no longer showed at the ICE Detainee Locator as being in DHS' custody.
8. On July 16, 2025, I called the Krome Immigration Court to ask where the bond hearings for people detained at Alligator Alcatraz were held. I was told they would be brought to the Krome facility on the date of their hearing. On the same date, I filed a motion for custody redetermination ("bond motion") on his behalf at the Krome Immigration Court.
9. On July 17, 2025, the motion for bond was rejected because I did not include the facility where R.P. was being held. I called the Krome Immigration Court to ask what the official name for Alligator Alcatraz was and was told that it was "Alligator Alcatraz".

10. On July 17, 2025, I included an allegation in the motion for bond that R.P. was detained at Alligator Alcatraz and resubmitted the motion. On the same date the motion was accepted and a notice of hearing was issued for a bond hearing on Wednesday, July 23, 2025 at 1pm before Immigration Judge Romy Lerner.
11. On July 21, 2025, I tried to file a Motion for Webex Appearance so that I could attend the hearing remotely, but the Motion was rejected because "CASE COMPLETE ON 07/21". The record showed that the alien had withdrawn the request for bond. See Exh. 1. I was confused, because I had not withdrawn the bond motion, and I knew that my client still wanted to pursue the bond motion.
12. On July 22, 2025, I called the Krome Immigration Court, and they told me that the Court had no jurisdiction over this case because my client was at Alligator Alcatraz. I asked who did have jurisdiction, and they told me to call DHS at 305-207-2100. I called that number, and when someone finally answered, I asked where I needed to file a request for bond for a client at Alligator Alcatraz, and they said: "Call the court". I replied that the court had told me to call them. She then gave a different number for another DHS office 305-207-2275. I called that number and got an error message. I called back the first number to tell the lady that number did not work and she replied: "that's the number that I have."
13. On July 23, 2025, R.P.'s hearing still showed on the docket so I appeared via WebEx. R.P. was not present at court, either in person or virtually. The IJ told me that she did not have jurisdiction over the case. When I asked who did, she said talk to DHS. She was empathetic, but there was nothing she could do.
14. I have not been able to speak confidentially with R.P. during his detention at Alligator Alcatraz, due to the attorney access restrictions described in this case. R.P., however, has confirmed that he would like to participate as a plaintiff and as a class representative in this case.
15. R.P. would like to proceed under pseudonym in this case to protect his wife who has a pending asylum application and to avoid any further stigma.

Executed this 29th day of July, 2025, in Orlando, Florida

  
Efraim Alsina